

# FIBERS SITE GROUP

June 10, 2015

*Via Email Electronic Copy*

Adalberto Bosque, PhD, MBA, REM, CEA  
Response and Remediation Branch  
U.S Environmental Protection Agency  
City View Plaza II - Suite 7000  
48 RD, 165 Km. 1.2  
Guaynabo, PR 00968-8069

Subject: RD/RA Monthly Report – May 2015  
Fibers Public Supply Wells Site  
Guayama, Puerto Rico

Dear Mr. Bosque:

On behalf of the Fibers Public Supply Wells Site Settling Defendants, we are submitting the attached RD/RA Monthly Report prepared pursuant to the Consent Decree (Civil Action No. 92-2486) in the matter of *United States v. Anaquest Caribe, Inc. et al*, Section IX, Paragraph 30, Reporting Requirements.

Please feel free to contact Mr. James Kirschner of ARCADIS at (602) 797-4519 or me at (724) 544-4874 if you have any questions or comments regarding this submittal.

Sincerely,



Joe Biss, CHMM  
Fibers Site Group Project Coordinator  
EHS Support LLC

Copies:

Chief, New York/Caribbean Superfund Branch, Attn. Mel Hauptman- via email only  
Ms. Evelyn Rivera-Ocasio, Assitant Regional Counsel – Carribean Programs – via email only  
Chief, Environmental Enforcement Division, U.S. Department of Justice (DOJ #90-11-2-768)  
Amarilis Rodríguez Méndez, State Remedial Project Manager, Puerto Rico Environmental Quality Board- via email only  
Ms. Katherine Mishkin, Hydrolgeologist, USEPA Superfund Technical Support Section – via email only  
Ms. Enid Díaz, Departamento de Recursos Naturales y Ambientales  
Mr. Jorge Morales, PRIDCO - via email only  
Mr. Joel Melendez Rodriguez, PRIDCO - via email only  
Ms. Ana Palou Balsa, PRIDCO – via email only  
Mr. Dan Vineyard, Jackson Walker- via email only  
James Kirschner, Arcadis - via email only

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Fibers Public Supply Wells Superfund Site  
Guayama, Puerto Rico

**(a) Description of actions which have been taken toward achieving compliance with this Decree.**

Fibers Air Stripping System

The United States Environmental Protection Agency (USEPA) granted approval (via an April 16<sup>th</sup> email to the Group's Project Coordinator) to allow the Fibers Group to proceed with the demolition of the existing air stripper and its replacement with a low profile air stripper. The USEPA did not have any comments on the Groundwater Extraction and Treatment System Basis of Design (ARCADIS, March 2015) or the preliminary construction design drawings (90%) that included details for the installation of the new air stripper remediation system, and a treated effluent water pipeline to the Phillips Ditch located southwest of the Chevron Phillips Chemical Company Puerto Rico CORE (CORE) facility.

Demolition of the former air stripper was completed on May 7, 2015.

Installation of the new treatment system, in accordance with the 100% CONSTRUCTION DRAWINGS, commenced on May 27, 2015. A QED Environmental Systems, Inc. (QED) EZ-48.4SS Tray air stripper assembly was moved from the Baxter-Guayama facility to the Fibers treatment compound and placed on a new concrete slab.

The Fibers Group is working with representatives of the Puerto Rico Land Administration (PRLA) and Puerto Rico Industrial Development Company (PRIDCO) to obtain easements for the proposed treated effluent water pipeline at the CORE facility and treated water discharge into the Phillips Ditch.

**(b) Summary of all sampling results and tests, and all other data received or generated by Settling Defendants.**

The Fibers Site Group received groundwater laboratory analytical data from the first semi-annual groundwater monitoring event of 2015. The validated laboratory analytical data will be submitted with the first semi-annual groundwater monitoring and sampling report for 2015.

**(c) List of all work plans, plans and other deliverables completed and submitted.**

The Fibers Site Group met with the Oficina de Gerencia de Permisos (OGPe) and hand delivered the treatment facility 100% CONSTRUCTION DRAWINGS. OGPe did not have any comments on the 100% CONSTRUCTION DRAWINGS.

**(d) Description of all actions, including, but not limited to, data collection and implementation of work plans, which are scheduled for the next six weeks.**

The first semi-annual groundwater monitoring and sampling event of 2015 was completed in May, 2015. The final laboratory analytical data was received and will be validated in June 2015. The first semi-annual groundwater monitoring and sampling report for 2015 is anticipated to be completed and submitted in July 2015.

Submit the treatment facility 100% CONSTRUCTION DRAWINGS to the USEPA in preparation for restart of the treatment system to the Phillips Ditch in accordance with the proposed schedule submitted on March 30, 2015.

Baxter International, Inc. (Baxter) contracted with Environmental Resource Technologies (ERTEC) to conduct a subsurface soil investigation at the Baxter-Guayama facility on the Fibers Site. The subsurface investigation commenced on February 3, 2015. On behalf of Baxter, ERTEC's subsurface soil investigation effort includes drilling 22 soil borings at the Baxter-Guayama facility. The attached Figure depicts proposed ERTEC soil boring locations. Validated laboratory analysis for the samples is expected to be completed in the next 6 weeks.

**(e) Information regarding the percentage completion, unresolved delays encountered or anticipated.**

The Fibers Group submitted the following correspondence to the USEPA and Puerto Rico Environmental Quality Board (EQB) to expedite Agency concurrence with the treated water discharge constituent monitoring requirements and proposed discharge to the Phillips Ditch:

- *Remediation System Air Stripper Effluent Concentrations Compared to ARAR-Based Discharge Criteria.* October 14, 2014 (sent via e-mail to USEPA and EQB on October 14, 2014).

At this time, the Fibers Group has not received a response from the Agencies regarding the ARAR-Based Discharge Criteria document. Coordination with the Agencies on this submittal, if any material comments need to be addressed, is necessary to move forward with the CERCLA 121(e) permit equivalency and promptly returning the treatment system to service.

The Fibers Group submitted a letter (March 30, 2015) to the USEPA requesting a meeting to discuss treated water discharge alternatives, including any appropriate interim alternative (letter submitted via e-mail on March 30, 2015).

**(f) List of any modification to work plans or other schedules the Settling Defendants have proposed.**

None.

**(g) Description of activities undertaken in support of the Community Relations Plan.**

No support activities have been requested for the next planning period.

**(h) Actions undertaken to address outside parties concerns.**

No concerns from outside parties were encountered during this reporting period.



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